

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	Crim. No. 11-10157-MLW
)	
ADAM HART,)	
TIMOTHY REARDON, and)	
WILLIAM NEOFOTISTOS)	
)	
Defendants.)	

ASSENTED TO MOTION FOR A CONTINUANCE

The United States of America, by and through the undersigned attorneys, hereby moves for a continuance of the sentencing date in this matter for a period of 90 days from the currently scheduled date of September 22, 2011.

In support of its motion, the government states that the defendants' plea agreements require the defendants to cooperate with the United States. Currently, this matter remains the subject of an ongoing criminal investigation. The government anticipates that the investigation will be concluded within the next ninety days. The plea agreements in this matter provide that the government will make a motion pursuant to U.S.S.G. §5K1.1 if the defendants provide substantial assistance to the United States. At the earliest, the government will not be in a position to make such a motion until the underlying criminal investigation is concluded.¹

¹ If helpful, the government will make a separate ex parte submission regarding the status of the underlying investigation.

The defendants assent to a continuance of their sentencing for the reasons set forth above.

Respectfully submitted,

Carmen M. Ortiz
United States Attorney

By: /s/ Fred M. Wyshak, Jr. _____
Fred M. Wyshak, Jr.
Robert A. Fisher
Assistant U.S. Attorneys

Date: September 7, 2011

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants.

/s/ Fred M. Wyshak, Jr. _____
Fred M. Wyshak, Jr.
Assistant U.S. Attorney